

MEMO ENDORSED



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Office of the New York State
Attorney General

Letitia James
Attorney General

April 30, 2025

Honorable Nelson S. Roman
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: *John Hamlett v. C.O. Taj K. Everly, et. al., 21-CV-6663 (NSR)*

Dear Judge Roman:

This action is a 42 U.S.C. § 1983 brought by incarcerated represented Plaintiff John Hamlett. I am the attorney assigned to this matter on behalf of the Defendants Everly, Dillon, Perrotta, Alban, T. Germano, Flanagan, and Kopp¹, ("Defendants") by their attorney, Letitia James, New York State Attorney General.

I am submitting this joint letter with consent from opposing counsel to request an adjournment of the conference presently scheduled with Your Honor on May 29, 2025.

Presently, Plaintiff's counsel and I are engaged in discovery. Most recently, Defendants have been turning over documentary discovery after a discovery conference held on March 14, 2025, and a follow up conference on April 7, 2025.

On April 28, 2025, Defendants submitted a request for an extension of time to respond to Plaintiff's Request for Production of Documents. (*see* ECF #87). Defendants submitted a revised case management plan with the proposed extension of time. *Id.* On April 28, 2025, Judge Krause granted the Defendants' request for an extension of time and accepted the revised case management plan. (*see* ECF #88).

¹ The remaining originally named defendants were dismissed after motion practice, per the Court's opinion and order dated April 30, 2024. (*see* ECF #56).

The case management plan is as follows:

Defendants Production of Documents and Responses to Interrogatories – due by Wednesday, May 21, 2025.

Fact Depositions (Parties and Non-Parties) – to be completed by July 11, 2025.²

Disclosure of Expert Witnesses, including reports or disclosures required by Rule 26(a)(2)(B) or Rule 26(a)(2)(C) – to be completed by July 25, 2025.

Expert Depositions - to be completed by August 8, 2025.

End of Discovery – to be completed by August 15, 2025.

The parties are scheduled to meet with Judge Krause for a conference on June 16, 2025, to ensure discovery is moving forward.

Accordingly, the Defendants – on behalf of both parties - are requesting the post-discovery conference be adjourned from May 29, 2025, to September 10, 2025, or another date the Court prefers, to allow time for the completion of all discovery.

Respectfully submitted,

Robert Feliu

Robert C. Feliu

Assistant Attorney General

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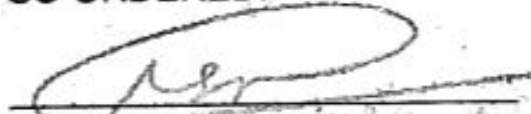
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In light of the extension of the discovery deadlines, the parties' request to adjourn the May 29, 2025 Status Teleconf. is GRANTED. The Status Teleconf. is adjourned to Oct. 9, 2025 at 10:00 am. To access the Webex Teleconf., please follow these directions: (1) Dial the Meeting Number: 855-244-8681; (2) Enter the Access Code: 2310 494 3855 # ; and (3) press # to enter the teleconf. Clerk of Court is requested to terminate the motion at ECF No. 89.

Dated: White Plains, NY

May 27, 2025

SO ORDERED:


HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE

² That date was extended four weeks, not three, because of the July 4, 2025, holiday, and I will be out of the office between June 30, 2025, through July 4, 2025.